

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

KEITH COLE, JACKIE BRANNUM,
RICHARD KING, FRED WALLACE,
LAVAR SANTEE, and MARVIN RAY
YATES, individually and on behalf of
those similarly situated,
Plaintiffs,

V.

BRYAN COLLIER, in his official capacity, ROBERTO HERRERA, in his official capacity, and TEXAS DEPARTMENT OF CRIMINAL JUSTICE,
Defendants.

CIVIL ACTION NO. 4:14-CV-1698

**DEFENDANTS' FOURTH VERIFIED STATUS REPORT REGARDING AIR
CONDITIONING AT TDCJ FACILITIES HOUSING
CLASS MEMBERS: OCTOBER 27, 2020**

KEN PAXTON
Attorney General of Texas

BRENT WEBSTER
First Assistant Attorney General

RYAN L. BANGERT
Deputy First Assistant Attorney General

DARREN L. MCCARTY
Deputy Attorney General for Civil Litigation

ELIZABETH BROWN FORE
Chief, Administrative Law Division

SHANNA E. MOLINARE
Chief, Law Enforcement Defense Division

Office of the Attorney General
P.O. Box 12548
Austin, Texas 78711-2548
512-463-2080 • fax 512-370-9069

TED A. ROSS
Assistant Attorney General
Attorney-in-Charge
State Bar No. 24008890
Southern District ID No. 22658
Ted.Ross@oag.texas.gov

CHARLES K. ELDRED
State Bar No. 00793681
Special Litigation Counsel

BENJAMIN DOWER
State Bar No. 24082931
Assistant Attorney General

JEANINE COGGESHALL
State Bar No. 24083162
Assistant Attorney General

Defendants, Bryan Collier and Robert Herrera, in their official capacities, and the Texas Department of Criminal Justice (Defendants), by and through the Office of the Attorney General, file this Fourth Verified Status Report Regarding Air Conditioning at TDCJ Facilities Housing Class Members. Included with this court filing are the verified temperature logs from September 1-30, 2020 and October 1, 2020 to October 15, 2020, for all locations within TDCJ where class members may be housed.

Dated: October 27, 2020.

Respectfully Submitted,

KEN PAXTON
Attorney General of Texas

BRENT WEBSTER
First Assistant Attorney General

RYAN L. BANGERT
Deputy First Assistant Attorney General

DARREN McCARTY
Deputy Attorney General for Civil Litigation

ELIZABETH BROWN FORE
Chief, Administrative Law Division

SHANNA E. MOLINARE
Chief, Law Enforcement Defense Division

/s/ Ted A. Ross
TED A. ROSS
State Bar No. 24008890
Assistant Attorney General

CHARLES K. ELDRED
State Bar No. 00793681
Special Litigation Counsel

BENJAMIN DOWER
State Bar No. 24082931
Assistant Attorney General

JEANINE COGGESHALL

State Bar No. 24083162
Assistant Attorney General

Office of the Attorney General of Texas
P. O. Box 12548, Capitol Station
Austin, Texas 78711
P: (512) 475-4191
F: (512) 457-4674

Ted.Ross@oag.texas.gov

Charles.Eldred@oag.texas.gov

Benjamin.Dower@oag.texas.gov

Jeanine.Coggeshall@oag.texas.gov

ATTORNEYS FOR DEFENDANTS

NOTICE OF ELECTRONIC FILING

I, Ted A. Ross, Assistant Attorney General of Texas, do hereby certify that I have electronically submitted for filing, a correct copy of the foregoing in accordance with the Electronic Case Files System of the Southern District of Texas, on October 27, 2020

/s/ Ted. A. Ross

Ted A. Ross
Assistant Attorney General

CERTIFICATE OF SERVICE

I, Ted A. Ross, Assistant Attorney General of Texas, do hereby certify that a true and correct copy of the above and foregoing has been served on all counsel of record via electronic mail on October 27, 2020, as authorized by Fed. R. Civ. P. 5(b)(2) and in accordance with the electronic case filing procedures of the United States District Court for the Southern District of Texas.

/s/ Ted. A. Ross

Ted A. Ross
Assistant Attorney General